

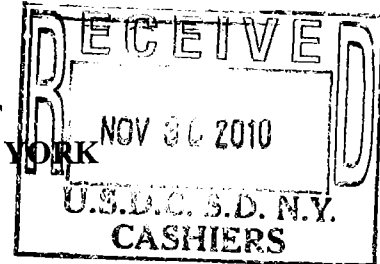
JUDGE BUCHWALD

10 CV 8967

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK



SOVEREIGN BANK,

Plaintiff,

v.

NUBIAN REALTY, LLC, NUBIAN
PROPERTIES, LLC, RICHELIEU W.
DENNIS, NYEMA S. TUBMAN, DIANE
NICHOLAS, NUBIAN HERITAGE DIRECT
LLC, NUBIAN HERITAGE OF HARLEM
LLC, THE NATIONAL BLACK THEATRE
WORKSHOP INC., HARLEM APPLE, LLC,
NEW YORK CITY TRANSIT
ADJUDICATION BUREAU, STATE OF
NEW YORK DEPARTMENT OF
TAXATION AND FINANCE, NEW YORK
CITY DEPARTMENT OF
TRANSPORTATION, NEW YORK CITY
ENVIRONMENTAL CONTROL BOARD,
NEW YORK CITY DEPARTMENT OF
FINANCE, THYSSENKRUPP ELEVATOR
COMPANY and JOHN DOE #1 through
JOHN DOE #10 inclusive,

Defendants.

Civil Action No.

RULE 7.1 DISCLOSURE STATEMENT

In accordance with Federal Rule of Civil Procedure 7.1, counsel for Plaintiff states as follows: Sovereign Bank is a Federal Savings Bank with its principal place of business in Pennsylvania, and is a subsidiary of and is wholly-owned by Santander Holdings USA, Inc.

Santander Holdings USA, Inc. is a subsidiary of and is wholly-owned by Banco Santander, S.A.

No publicly-held corporation owns 10% or more of the stock of Banco Santander, S.A.

RIKER, DANZIG, SCHERER, HYLAND &
PERRETTI LLP

Attorneys for Sovereign Bank

By: _____

Jonathan P. Vuotto

Dated: November 30, 2010